IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISON

FASCIA EDWARDS,	)	
	)	
Plaintiff,	)	
	)	No. 12 C 371
v.	)	Hon. Marvin Aspen
	)	
ILLINOIS DEPARTMENT OF FINANCE	)	
PROFESSIONAL REGULATIONS, et al.	)	
	)	
Defendants.	)	

DEFENDANT'S MOTION *IN LIMINE* NO. 7
TO BAR EVIDENCE OF AND REFERENCE TO EQUITABLE DAMAGES,
INCLUDING BACK WAGES, PENSION BENEFITS, AND HEALTH BENEFITS

Defendant, by and through its attorney, Lisa Madigan, Attorney General for Illinois,

hereby moves this Honorable Court to enter the following order *in limine*:

1.   In this case, Plaintiff seeks, amongst other relief under the ADA, back pay and

reimbursement for lost pension, social security and other benefits, and out-of-pocket expenses.

Fourth Am. Compl. at 8-9 (ECF No. 44).

2.   Such equitable remedies are matters that should be determined by the Court only

after a jury determination of liability in favor of the Plaintiff. *See Pals v. Schepel Buick & GMC*

Truck, Inc., 220 F.3d 495, 500-01 (7th Cir. 2000).

3.   Accordingly, Defendant moves to bar the Plaintiff from asserting, claiming,

presenting evidence regarding, or referencing any request for back wages, pension benefits,

health benefits, or other equitable remedies to the jury. *See id.*

WHEREFORE, Defendant moves this Honorable Court enter an Order excluding evidence, testimony, or argument related to equitable damages including, but not limited to, back wages, pension benefits, health benefits, and for such further relief that the Court finds reasonable and just.

Respectfully Submitted,

LISA MADIGAN
Illinois Attorney General

s/ *Kevin Lovellette*
Kevin Lovellette
Assistant Attorney General
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CERTIFICATE OF SERVICE

The undersigned certifies that on March 16, 2017, he electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the Northern District of Illinois using the CM/ECF system. All participants in the case are registered CM/ECF users who will be served by the CM/ECF system.

s/ *Kevin Lovellette*